



February 4, 2022

**VIA ECF**

Hon. Katherine Polk Failla  
United States District Court  
Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re:                   Piotrowicz v. Techtronic Industries North America, et al.  
                      Plaintiff's Motion for Leave to File Under Seal  
                      Civil Action No.: 1:19-cv-11522

Dear Judge Failla:

This office represents the Defendants (Techtronics Industries, One World Technologies and Home Depot) in the above matter. We write to register support for Plaintiff's Motion for Leave to file under Seal (Dkt. 146) and to independently file its own motion to file the same document under seal.

At the outset, I commend Plaintiff's counsel, Mr. Minc, for considering the parties' existing Stipulation and Order of Confidentiality and for discussing the pertinent document (the "Supply Agreement") with me before his filing.

Defendants currently plan to attach the Supply Agreement as part of its papers in opposition to Ningbo Dalton's Motion to Dismiss, which will be filed on or before the current deadline date of February 15, 2022; hence, the Defendants join in Plaintiff's motion.

As for the document itself, the Supply Agreement contains sensitive "trade secret"-type information regarding when and how my clients arranged for the manufacture of the miter saws at issue. The document contains the names and addresses of suppliers and "hard" numbers dealing with minimum sales amounts, pricing, etc. The document would be of extreme interest to Defendants' competitors in the power tool industry and for that reason should be kept off the "public" portion of the e-filing system.

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The Court can be assured that all parties will be provided with an unredacted copy of the document via direct e-mail.

Defendants adopt the arguments raised by Plaintiff in his Motion.

Thank you in advance for considering Defendants' position.

Very truly yours,

**Wilson Elser Moskowitz Edelman & Dicker LLP**

/S/

Rosario M. Vignali

RV/bs

Enclosure

cc: Rosenberg, Minc, Falkoff & Wolff, LLP (via ECF)  
Goldberg Segalla LLP (via ECF)

Application GRANTED.

Defendants may file the supply agreement under seal, viewable only to the parties and Court.

The Clerk of Court is directed to terminate the motion at docket entry 148.

Dated: February 4, 2022  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE